

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FILED-CLERK
U.S. DISTRICT COURT
2010 SEP -3 PM 2:52
TX EASTERN-MARSHALL

Robert James Fox
Plaintiff

CAUSE #2:10 cv 158

BY _____

V.

City of Jacksonville, Texas
Mo Raissi Private Capacity
Robert Haberle Private Capacity
Kenneth Melvin Private Capacity
Hubert Robinson Private Capacity
Jeff Smith Private Capacity
Rob Beall Private Capacity
Betty Thompson Private Capacity
Reece Daniel Private Capacity
John Page Private Capacity
Jason Price Private Capacity
Travis Cearley Private Capacity
Daniel G. Franklin Private Capacity
Paul Allen Private Capacity
Anthony G. Forson Private Capacity
Jon Shobert Private Capacity
Tonya E. Sonntag Private Capacity
David M. Gayler Private Capacity
B. K. Menefee Private Capacity
J. Dan Connelly Private Capacity
D. Bret Brewer Private Capacity
Joe Angle Private Capacity
Kathleen Stanfield Private Capacity
Craig Caldwell Private Capacity
Elmer C. Beckworth Jr. Private Capacity
Gordon LeMaire Private Capacity
Rachel Patton Private Capacity
Craig Fletcher Private Capacity
Dwight Phifer Private Capacity
Bascom W. Bentley III Private Capacity
James Campbell Private Capacity
Charlotte Huffman
David Tillery
KETK-56 NBC TV
Joe Terrell
KLTV-7 ABC TV
Jacksonville Daily Progress
TEXAS MUNICIPAL LEAGUE

PRE-SERVICE
R.I.C.O. UPGRADE
AMENDED COMPLAINT
BY AFFIDAVIT OF
Robert James Fox

Trial By Jury Demanded

STATE OF TEXAS	§
Governor Rick Perry	§
Attorney General Greg Abbott	§
John Does & Jane Roes 1-1000	§
Defendants	§

State of Texas	§
Cass County	§

I, Robert James Fox, am a sovereign, sui juris, man upon the land, a follower of Yahshua the Messiah in the laws of The Almighty Supreme Creator, YHVH first and foremost and the laws of man when they are not in conflict (Leviticus 18:3,4). Pursuant to Matthew 5:33-37 and James 5:12, let my yea be yea, and my nay be nay, as supported by Federal Public Law 97-280, 96 Stat. 1211. I am over the age of majority and have personal knowledge of the matters stated herein, and hereby asseverate understanding the liabilities presented in *Briscoe v LaHue* 460 US 325

I, Robert James Fox, the Plaintiff, *sui juris*, unrepresented, complaining of defendants herein, respectfully state and allege the following:

- 1) That this is an action for money damages to redress the defendants deprivation of the rights secured to myself, and others similarly situated under rogue paramilitary attack by mercenaries (not class action), under the Constitution and laws of the United States of America and the State of Texas.
- 2) That pursuant to an extensive investigation the evidence shows the Defendants purporting to be police and/or City of Jacksonville management failed and neglected to conform and file their lawfully required documentation in the public record, wherefore the Defendants herein have been falsely posing as officials while executing overt criminal acts or acting in collusion in the criminal conspiracy against me, and/or engaged in the criminal cover up of same, all of which totally strips the Defendants herein of any and all immunity;
- 3) That Defendants a/k/a "the racketeers" are persons within the scope of racketeer influenced corrupt organization (RICO) laws who violated RICO laws causing injury to my religious free exercise, my very body, property, financial resources, and business interests. The racketeers are associated with, or act in collusion with, the enterprises "CITY OF JACKSONVILLE", EIN #1-756000569, and/or CHEROKEE COUNTY, and/or "STATE OF TEXAS". The racketeers either participate or have participated in the conduct of the enterprises. The participation was through a pattern of racketeering activities resulting in injury to my religious free exercise, my very body, property, and business interests. The racketeers are connected and bound to the CITY OF JACKSONVILLE, and/or

CHEROKEE COUNTY, and/or STATE OF TEXAS enterprises which are RICO enterprises by reason of records which demonstrate a pattern of activity in violation 18 USC §§1961 & 1962. The acts which were committed or aided and abetted by the racketeers were the proximate cause of my being defrauded of my religious free exercise, property, financial resources, business interests, and even liberty. The frauds committed by the racketeers were reasonably foreseeable or anticipated to result in the financial and even physical injury to myself as a natural consequence. The racketeers pose a threat of continued criminal activity. The racketeers whose role was to aid and abet in predicate acts of fraud was knowing, intentional, and reckless. The racketeers committed or abetted more than two predicate acts rising to a pattern of racketeering; the racketeers directly participate in the conduct of the CITY OF JACKSONVILLE and/or STATE OF TEXAS enterprises as so-called "officers" of the enterprise. The enterprises' activities affect interstate commerce. The racketeers committed or abetted frauds which were part of a scheme of fraud that would have the foreseeable result of financial injury to my religious free exercise, property, business interests, and even liberty. The racketeers' criminal conduct was merely a footnote in a long history of activities which enable persons like the racketeers to obtain interest in and maintain control of the CITY OF JACKSONVILLE and/or STATE OF TEXAS enterprises. Without exception, the racketeers had actual knowledge of the falsity of their actions and acted with intent to defraud. Even those aiding and abetting shall be shown to be willfully blind to criminal acts and exhibiting a conscious, reckless disregard for my interests. Indeed, absent legally created police department and absent legally situated city management, the City of Jacksonville began a series of THREE SWAT type attacks in less than a month against me; and ABSENT CONVICTION in the course of even more attacks upon me, I was seized, handcuffed, and inducted into involuntary servitude A TOTAL OF FIVE TIMES AND JAILED FOUR TIMES in this Religious and Political Persecution, DESPITE SIX VICTORIES IN A ROW VERSUS ZERO FOR THE PRETEND POLICE, so far I have suffered 146 DAYS OF SUMMARY INCARCERATION, PLUS I WAS HELD TO DISCRIMINATORY AND EXTORTIONATE BONDS OF \$150,000.00 as summary pre-trial punishment over the course of MORE THAN TWO YEARS OF INVOLUNTARY SERVITUDE during which, in part, producing legal documents as are made available to the world for the racketeer's profit and gain through the clerk's office, plus their utilizing other means of enrichment in their INLAND PIRACY SCHEME; on May 15, 2008, absent

arrest warrant, and being trespassers ab initio, the defendants, acting in collusion directly or indirectly, in the nature of aggravated assault, aggravated kidnapping, armed robbery, and imposing involuntary servitude, acting as pirates in an inland piratical enterprise unreasonably seized me at gun point, handcuffed me, inducted me into involuntary servitude by force of arms by making me wend my way through three postal designations, in an attempt to wrongfully frame me and maliciously prosecute me when I had committed no crime, and defendants have and absent retraction are continuing to subject me to degrading and humiliating search and seizure, restraint of my liberty and freedom by keeping me in criminal jeopardy, and public religious persecution, public vilification and defamation of my character by making false statements to the media about me in regard to my personal spiritual beliefs and practice and exercise thereof, creating tortuous interference with future economic third party relationships, and present day liberty of contract, even destroying religious property contrary to 18 USC §247, thereby causing extreme emotional distress; on May 22, 2008, Charlotte Huffman from the Tyler Texas NBC affiliate, with camera crew on the sidewalk along with numerous other media people, was present in the City of Jacksonville to assist the mercenaries from the "Fake It Until You Make It Police Department" with their staged publicity event wherein the mercenaries deliberately knocked on the wrong door, as in knocking at the door of Dillards when they know I am in Sears, all initiated well before the aggravated assault, aggravated robbery, aggravated kidnapping, induction into involuntary servitude, armed robbery, and Felony Elder Abuse as was recorded for fun and profit, all being choreographed in order to be able to use the battering ram, contrary to 18 USC §247 for the second time, for the profitable entertainment value and to create jury pool bias as well as prejudicial indoctrination of the entire multi county television audience as I was seized and jailed on bogus drug charges which were ultimately set for jury trial on August 31, 2009, although the pre-trial evidentiary hearing on July 28, 2009 gave the Pretend Jacksonville Police Department the OPPORTUNITY to present their evidence, however they had NO EVIDENCE IN SUPPORT OF THEIR CHARGE OF "POSSESSION", indeed the Pretend Jacksonville Police Department had NO CASE, only hysterical nonsense for which there was no need to present any defense testimony whatsoever as Judge Nelms from Dallas appropriately found me **NOT GUILTY** on all four of the bogus drug charges since there was no evidence of a crime on my part;

4) That the defendants have no immunity whatsoever due to their egregious criminal acts, their wrongful criminal cover up, and their outrageous obstruction of justice which has made criminal prosecution of the impostor police impossible despite the Grand Jury oath to take criminal complaints from any credible person, as the criminal conduct of the paramilitary gangsters impermissibly infringed on my right to privacy and seclusion, freedom to peacefully associate and assemble with others, redress of grievances, and my right to contract with the Almighty Creator, Yahvah and others in furtherance of my strongly and sincerely-held spiritual training and beliefs, all beneficial to society and government, and my right to be left alone; indeed the net result of the THREE SWAT type attacks in less than a month was that I was rendered homeless and essentially destitute, while our church group was not only deprived of the Bible study meeting place but literally concerned for our very lives as various defendants have been aggressively involved in **Witness Tampering** from the inception of this CRIMINAL CONSPIRACY TO COMMIT RELIGIOUS AND POLITICAL PERSECUTION, relentlessly utilizing Slander And/Or Libel in a malicious vilification program large enough in scope as to go international, which even had Cherokee County District Court Judge Bascom Bentley acting in collusion in the scheme as evidenced by his assuming facts not in evidence and railing against our church group on the record in open court, and in this case the RELIGIOUS AND POLITICAL PERSECUTION, relentlessly utilizing Slander And/Or Libel, even tainted the grand jury, wrongfully resulting in a bogus indictment against me; furthermore 78 year old witness John Verhage was unlawfully kept out of the Cherokee County public proceeding and actually removed by force of arms contrary to Texas Code of Criminal Procedure, Article 1 24, in violation of Texas Penal Code, Section 39.03, Official Oppression and in Felony Breach of Oath, all against the peace and dignity of the State of Texas; 70 year old Judith Metcalf Scott, recovering from six bypass heart surgery has been arrested twice, physically abused, and threatened right to her face; witness Karin Latner was also threatened right to her face; witness David Baugh has been wrongfully jailed twice and spent 311 days in solitary confinement; and as a matter of **RETALIATION** an unlawful warrant was wrongfully issued to create a life threatening attack by force of arms upon witness Randall Kelton, which could be considered in the nature of attempted murder as it is a statistical matter that thousands die at arrest, wherefore all things considered my chances of an untainted, fair, and neutral jury at any trial are effectively eliminated in Cherokee County

Furthermore, I filed a lawsuit and moved for deposition as to Slander and Libel, however given the OPPORTUNITY to verify their public declarations the pretend police chose to threaten me with arrest in order to eliminate the deposition I was attempting to schedule, indeed even given the OPPORTUNITY to verify her public declarations, Kathleen Stanfield, who is a prominent, active businesswoman in Jacksonville, could not be served by private process service for the deposition, and even when subpoenas were issued to compel her testimony as a **hostile witness** in the criminal cases, on four different occasions even the Cherokee County Sheriff's Department was **STRANGELY UNABLE to secure her appearance as required by both the Texas Constitution and Texas Code of Criminal Procedure.**

5) That on May 15, 2008, the aforesaid was committed against me by the defendants, jointly and severally absent any arrest warrant, and absent any probable cause, with none of them actually acting to stop the illegal, unconstitutional, and maliciously inflicted damages, or in other words NEGLIGENCE, furthermore verifying their intent by making no retraction whatsoever.

6) That on May 22, 2008, while violating the Texas Code of Criminal Procedure, Articles 15.24, 15.25, 15.26 and much more, the City of Jacksonville and the defendants created the grounds for prosecution as per R.I.C.O. via their second SWAT attack, with mercenary Reece Daniel expressing his intent and declaring for the media, "We want to stop this thing BEFORE it gets started." (emphasis added) AND "...they are going to run out of paperwork before we run out of jail cells.", furthermore, in the secret confines of the jail facility, Reece Daniel even assaulted me, and if I had done to him what he had done to me I would have been prosecuted to the fullest extent of the law, whereby the aforesaid was committed against me by the defendants, jointly and severally absent proper process, and absent any probable cause, with none of the defendants actually acting to stop the illegal, unconstitutional, and maliciously inflicted damages, or in other words NEGLIGENCE, furthermore verifying their INTENT by making no retraction whatsoever.

7) That on June 11, 2008, while violating the Texas Code of Criminal Procedure, the City of Jacksonville conducted a third attack to load up a 16 foot trailer with all the computers, file cabinets, files, plus many resources not listed on any warrant but taken to cripple my defenses against their inland piracy scheme.

- 8) That on December 3, 2008, when I appeared for Arraignment on the bogus drug charges, absent the ability to violate the statute, I was attacked and handcuffed for the fourth time upon the preposterous nonsense of Felony Barratry and Solicitation of Professional Employment, whereby I was seized by force of arms, taken to Jacksonville to be taunted and ridiculed by an assembly of numerous terrorists falsely posing as police, I was jailed, inducted into Involuntary Servitude, and held in solitary confinement to pay an outrageous discriminatory bond of \$30,000.00 upon a NON-EXISTENT CRIME which I could not commit even if I tried, as was essentially verified on March 11, 2009, when the office of Cherokee County District Attorney stipulated that the matter would not be brought to trial or even be presented to any Grand Jury, although the bank was in fact made to appear before the Grand Jury as per the real purpose of the fraudulent criminal persecution being to investigate financial matters relating to the April 30, 2008, purchase of the former Methodist Church building that Kathleen Stanfield wanted for herself;
- 9) That on January 23, 2009, after filing a Tort Claim upon Jacksonville Risk Management pursuant to the Texas Tort Claims Act, when I appeared for a hearing on the bogus drug charges, I was attacked and handcuffed for the fifth time upon the preposterous nonsense of Tampering With a Government Record whereby I was seized by force of arms, taken to Jacksonville to be admonished by Reece Daniel who attempted to trick me into stopping the writing of my defenses, followed by being TORTURED by means of wrist locks applied by Jason Price and David M. Gayler (who to his credit ceased when my screams rang out through the jail, as Jason Price caused my writing hand/wrist to be damaged whereby I suffered pain for weeks), while all were falsely posing as police, I was jailed, inducted into Involuntary Servitude, and held in solitary confinement to pay an outrageous discriminatory bond of \$30,000.00 upon a NON-EXISTENT CRIME, whereby I was overwhelmed by the unlawful and relentless abuse and by January 26, 2009, I was taken by ambulance from the jail to the hospital for oxygen and nitro, and I now suffer from congestive heart failure;
- 10) That the criminal acts, the criminal conspiracy, the criminal cover up, the torts and all civil damages were created by specific intent as evidenced by no retractions, no apologies, and a relentless ongoing attempt to utterly destroy me and/or murder me under of law in the nature of genocide.

PARTIES

11) That at all times herein mentioned, I, Robert James Fox, the Plaintiff, am a living, breathing, natural man, and that I currently maintain my domicile and household in Cass County, at 1304 CR 1890, Bivins, Texas 903-799-5500

12) That at all times herein mentioned, the City of Jacksonville was and is a city in the State of Texas, which was and is one of the fifty States comprising the United States of America. Further, the City of Jacksonville was and, on information and belief, still is the employer of the evil miscreants known as Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson named as defendants herein. Defendant, City of Jacksonville may be served with process by serving the alleged City Secretary for the City of Jacksonville, Ms. Betty Thompson, at the City Hall, 301 E. Commerce Street, Jacksonville, Texas 75766, telephone 903-586-3510.

13) That at all times herein mentioned, the City of Jacksonville was and is a city in the State of Texas, which was and is one of the fifty States comprising the United States of America. Further, the City of Jacksonville was and, on information and belief, still is the employer of the mercenaries named as defendants herein. Defendant, City of Jacksonville may be served with process by serving the alleged City Secretary for the City of Jacksonville, Ms. Betty Thompson, at the City Hall, 301 E. Commerce Street, Jacksonville, Texas 75766, telephone 903-586-3510.

14) That at all times herein mentioned, defendants, Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, and Jon Shobert who participated pursuant to the incident report on the evening of May 15, 2008 when the piratical aggravated assault on me giving rise to this complaint took place, were and, to the best of my knowledge and belief, to this date are still mercenary employees of the City of Jacksonville, as are David M. Gayler and Tor:nya Sonntag, all acting in collusion in the nature of pirates and may be served with process in their private capacities by serving each at the Jacksonville Police Department, A/K/A "The Fake It Until You Make It Police Department" 210 West Larissa, Jacksonville, Texas 75766.

15) Private party Kathleen Stanfield, resident of the City of Jacksonville, may be served with process at the Larissa House, 301 W. Larissa, Jacksonville, Texas 75766, telephone 903-586-5356

16) That at all times herein mentioned, defendants B. K. Menefee and J. Dan Connelly

were posing as municipal judges acting for the City of Jacksonville and may be served with process in their private capacity at the City Hall, 301 E. Commerce Street, Jacksonville, Texas 75766, telephone 903-586-3510.

17) That at all times herein mentioned, defendant Craig Fletcher, was and is the County Judge acting for Cherokee County and may be served with process both in his private capacity and Official capacity at the Cherokee County Courthouse, Rusk, Texas 75766, telephone 903-683-6497

18) That at all times herein mentioned, defendants Joe Angle and D. Brett Brewer, were and are attorneys acting for the City of Jacksonville and may be served with process both private capacity and Official capacity at the the City Hall, 301 E. Commerce Street, Jacksonville, Texas 75766, telephone 903-586-3510.

19) That at all times herein mentioned, defendants Bascom W. Bentley III and Dwight Phifer were and are District Court Judges acting for the STATE OF TEXAS and/or Cherokee County and may be served with process in both their private capacity and Official capacity at the Cherokee County Courthouse, Rusk, Texas 75766, telephone 903-683-2236.

20) That at all times herein mentioned, defendants Elmer C. Beckworth Jr., Gordon LeMaire, and Rachel Patton were and are prosecutors acting for the STATE OF TEXAS and/or Cherokee County and may be served with process both in their private capacity and Official capacity at the Cherokee County Courthouse, Rusk, Texas 75766, telephone 903-683-2573.

21) That at all times herein mentioned, defendant James Campbell, was and is the Sheriff acting for Cherokee County and may be served with process both in his private capacity and Official capacity at the Cherokee County Sheriff Department, Rusk, Texas 75766, telephone 903-683-2271.

22) That at all times herein mentioned, defendant Attorney General Greg Abbott was and is the Texas Attorney General in his Official Capacity, and may be served with process in his Official capacity by serving him via P.O. Box 12548 Austin, Texas 78711-2548, telephone 512-463-2100.

23) That at all times herein mentioned, defendant Governor Rick Perry was and is the Texas Governor in his Official Capacity, and may be served with process, both in his

individual capacity and Official capacity by serving him via P.O. Box 12428 Austin, Texas 78711-2428, telephone 512-463-2000.

23) Texas Municipal League rec. process at 1821 Rutherford Lane, #400, Austin, TX 78754

24) The STATE OF TEXAS may be served with process via Secretary of State P.O. Box 12697 Austin, Texas 78711-2697, telephone 512-463-5770.

25) Charlotte Huffman, David Tillery, and KETK-56 NBC TV may be served with process at 4300 Richmond Road, Tyler, Texas 75703 903-581-5656

26) Joe Terrell and KLTV-7 ABC TV may be served with process at P.O. Box 957, Tyler, Texas 75710 903-597-5588

27) Jacksonville Daily Progress may be served with process at 525 E. Commerce Street, Jacksonville, Texas 75766

BACKGROUND

28) That at all times herein mentioned, the defendants, jointly and severally, were acting under color of law, under color of office, that is, under color of the constitution, statutes, laws, rules, regulations, customs and usages of the State of Texas and customs ordinances, policies and practices of the City of Jacksonville and its mercenary department which was not legally established as a police department, and neither was the city management legally in place.

29) That at all times herein mentioned, the defendants and each of them, separately and in concert with each other, engaged in acts and omissions which constituted deprivation of my rights, privileges, and immunities, and while these acts were carried out in uniform (war criminals) under color of law, they had no justification or excuse in law, and instead were in bad faith, and with unclean hands, illegal, improper, palpably irrational, unreasonable, and unrelated to any activity in which law enforcement officers may appropriately and legally engage in the course of protecting persons and property or ensuring civil order.

30) That at all times herein mentioned, each of the defendants had, and has the power and duty to restrain themselves, and the other defendants, and prevent themselves, and the other defendants from violating the law and my rights, but that each of the defendants, in their respective Official and private capacities, has failed and refused, and are failing and refusing to perform that sworn duty, and have failed and refused, and are failing and refusing to restrain themselves and the other defendants, and thereby have become

parties to the severe and extreme damages and injuries inflicted on me, individually and collectively.

JURISDICTION

31) Presentment and acceptance of United States Postal money order creates a purchase money agreement which is established as a matter of record under cause #2:10 cv 158 as a secured contract for fair, equal justice as promised by The United States to be provided by its courts and its agents. The jurisdiction of this Court is invoked under the provisions of §§1331, 1332 and 1343(a)(1-4) of Title 28, U.S.C., and §§1983, 1985 and 1986 of Title 42, U.S.C., and Title 18, Chapter 96 Racketeer Influenced Corrupt Organization, Title 18 U.S.C. §1964(a)(b)(c), FOR RACKETEER INFLUENCED CORRUPT ORGANIZATION ACTIVITY, P.A.T.R.I.O.T. ACT, TORTURTE ACT, RELIGIOUS FREEDOM RESTORATION ACT, and the supplemental jurisdiction of this Court, under §1367 of Title 28, U.S.C., with respect to the causes of action under state law sounding in tort.

OFFER OF PROOF

32) I have witnesses, evidence and testimony in an offer of proof that the defendants, acting in collusion, committed criminal acts as part of their lawless rampage, while proceeding for improper purpose, and consequently have NO IMMUNITY, QUALIFIED OR OTHERWISE, furthermore many fail to qualify for Official Capacity as there is no valid City of Jacksonville management, no valid municipal court judges, no lawfully created police department, and no valid police officers.

33) The court cannot refuse an offer of proof.

34) Upon evidencing the essential facts, it will be plain and clear that the defendants, acting in collusion, committed criminal acts as part of their lawless rampage, while proceeding for improper purpose, and consequently have NO IMMUNITY, QUALIFIED OR OTHERWISE

36) *"Allegations such as those asserted by petitioner, (a pro se litigant), however inartfully pleaded, are sufficient to call for the opportunity to offer supporting evidence. Accordingly, although we intimate no view on the merits of petitioner's allegations, we conclude that he is entitled to an opportunity to offer proof"*

Haines v. Kerner, 404 U.S. 519, 522

37) Pursuant to *Haines v. Kerner* I hereby **DEMAND A SHOW CAUSE HEARING** in order that the truth be ascertained and proceedings justly determined as per the RULES OF EVIDENCE, RULE 102.

FACTS

38) That on May 15, 2008, at approximately 6:35 P.M., I was napping in bed on private property at 209 E. Rusk, Jacksonville, Texas, which adjoins the building known as the "house of Israel," with address of 300 South Main Street and is a part of the property, where I provide spiritual, historical, and legal educational information and materials through my evangelical ministry, "Matthew 25 Mission," when awoken to find myself having a machine gun pointed at me and I was immediately handcuffed, despite the fact that the object of the attack, David George Baugh, had already been seized and removed.

39) Subsequently I learned that absent the requisite Texas Code of Criminal Procedure Article 51 arrest warrant the armed mercenaries had already kidnapped David George Baugh from an adjacent room as a felony parole absconder, the falsity of the seizure being evidenced by David George Baugh's unconditional release 276 days later without ever having been extradited or even found to be a felony parole absconder.

40) Furthermore, David George Baugh's properly titled and registered and insured automobile which was locked up and parked on the same private property was stolen from the property as a matter of armed robbery, as evidenced by conversion action #2009-08-0555 in the 2nd Judicial District Court, Cherokee County Texas.

41) I was forced at gun point and by involuntary servitude to wend my way from 209 E. Rusk, through 205 E. Rusk, to 300 S. Main Street where I observed that contrary to 18 USC §247 the paramilitary gangsters had destroyed a glass office door by smashing it to smithereens with a battering ram.

42) The handcuffs were then removed, however prior to leaving to find a repairman for the smashed door I was shown some left over dental antibiotics from the now closed dental office as a prelude to accusing me of possession of drugs, the existence of which I knew nothing about

43) Absent legal authority the expensive private property dental antibiotics were seized and never returned by the paramilitary gangsters acting as pirates.

44) I had a firm, good faith reliance that even the paramilitary gangsters falsely posing as public servants, pretending to be officers of the court had executed oaths of office to

uphold and support both State and Federal Constitutions, and to uphold the law as it is written.

45) I had a firm, good faith reliance that the paramilitary gangsters falsely posing as public servants, pretending to be officers of the court had been educated, trained, paid, and sworn to uphold the law as it is written, however within a few days I was duly informed that the entire event was staged due to the fact I was involved with raising funds whereby our church group acquired a church building that one Kathleen Stanfield wanted for herself.

LAW

46) The proceedings were instituted for an improper purpose contrary to ALBRIGHT V. OLIVER, 510 U.S. 266 (1994) which provides as the law of the land that it is a breach of the Fourth Amendment for search and seizure to be conducted for improper purpose, said improper purpose being false drug charges being used in conjunction with illegal wire taps, to create an unlawful open ended "Fishing Expedition" by force of arms as to the financial documentation which was ultimately taken to the Grand Jury by the office of Cherokee County District Attorney Beckworth regarding the purchase of the former Methodist Church building, as was opposed by influential person Kathleen Stanfield; also Rossignol v. Voorhaar, 316 F.3d 516 (4th Cir. 2003) provides that one purpose of 42 U.S.C. §1983 is to prohibit conspiracies between local law enforcement officers and private individuals to violate the constitutional rights of others.

47) U.S. v. Kozminski, 487 US 931, Thirteenth Amendment and the law of the land as per, *Held*: For purposes of criminal prosecution under § 241 or § 1584, the term "involuntary servitude" necessarily means a condition of servitude in which the victim is forced to work for the defendant by the use or threat of physical restraint or physical injury or by the use or threat of coercion through law or the legal process. This definition encompasses cases in which the defendant holds the victim in servitude by placing him or her in fear of such physical restraint or injury or legal coercion. Pp. 487 U. S. 939-953.

48) *The Fourth Amendment to the U.S. Constitution* provides that: *"The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched,, and the persons or things to be seized."*

49) *The First Amendment to the U.S. Constitution* provides that: "Congress [or state legislatures] shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech [or to choose not to speak and the right to privacy and to be left alone], or of the press; or the right of the people peaceably to assemble [which includes the right to interstate travel], and to petition the Government for a redress of grievances."

50) *The Fifth Amendment to the U.S. Constitution* provides that: "No person...shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or, without due process of law; nor shall private property be taken for public use, without just compensation."

51) *The Sixth Amendment to the U.S. Constitution* provides that: "In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses [real damaged parties or victims] against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense."

52) *The Thirteenth Amendment to the U.S. Constitution* provides that: "Neither slavery nor involuntary servitude, except as punishment for crime whereof the party shall have been duly convicted shall exist within the United States, or any place subject to their jurisdiction."

53) *The Fourteenth Amendment to the U.S. Constitution* provides that: "...No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law, nor deny to any person within its jurisdiction the equal protection of the laws."

54) "Where rights secured by the Constitution are involved, there can be no rule making or legislation which would abrogate them." *Miranda v. Arizona*, 384 U.S. 436, 491.

55) *Public Law 97-280, 96 STAT. 1211 (1982)* provides that the Bible is the Word of God and is to be applied in America.

CLAIMS

56) I repeat and reiterate each and every allegation and statement contained in the paragraphs of this Complaint designated as 1 through 55 inclusive, with the same force and effect as though each were fully set forth at length herein.

57) The foregoing undisputed facts I've presented under penalty of perjury clearly show that City of Jacksonville mercenary employees, Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya Sonntag aided and abetted by the other defendants, in moving against me, invaded my reasonable expectation of privacy, and effected their unwarranted assault on me, and unwarranted arrest of me by force of arms, and forcefully conducting their unwarranted search of my private property, and forcing me into involuntary servitude by force of arms, carelessly, recklessly, and negligently, in felony breach of their respective fiduciary duty to uphold and obey the State and U.S. Constitutions. It is perfectly clear they acted indifferently to my rights guaranteed by the State and U.S. Constitutions, and that their respective actions were criminal in nature, under color of law, under color of office, and serving absolutely no legitimate government purpose or compelling public interest whatsoever.

58) Furthermore, defendant mercenary, Reece Daniel, and defendant mercenary Jason Price, exceeding the scope of their strictly limited constitutional and statutory authority, both knowingly and willfully made completely false public statements regarding me, publicly vilifying and damaging me in the public eye and bragging about it, thereby admitting for the record of this matter that the patently unlawful, felony criminal and unconstitutional actions against me by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott is the general practice, policy, and custom in their training and supervision of misfit employees of the Jacksonville Fake It Until You Make It Pretend Police Department and City of Jacksonville general policy to undermine the State

and U.S. Constitutions in the nature of sedition and treason, and have, and exercise impermissible unfettered discretion to subjectively, arbitrarily, and capriciously attack and vilify anyone and everyone including myself whom they arbitrarily, or capriciously, suspiciously deem to be politically or religiously incorrect and thereby allegedly suspected of crimes or criminal activity, completely absent any reasonable belief sufficient to rise to the level of *Fourth Amendment* probable cause muster to effect my unwarranted arrest, by their assuming facts not in evidence to substantiate their obviously biased, prejudiced and fallacious claims. Furthermore, since these matters involve a (1) a conspiracy; (2) two or more events in ten years; and (3) absent remedial action the abuse will likely continue; indeed as it has already and is depriving myself and others of the place we used to gather for Bible study and worship.

59) The unwarranted egregious actions of the defendants against me resulted in me being vilified and slandered in the local community by local media, both in the local newspapers and on local television repeatedly, where photographs taken of me by the Jacksonville mercenary defendants and/or others at the behest of Jacksonville mercenary defendants was shown full screen implying that I am a dangerous criminal, causing me severe and extreme mental and emotional distress, public degradation, defamation, humiliation and embarrassment

FIRST CAUSE OF ACTION

60) I repeat and reiterate each and every allegation and statement contained in the paragraphs of this Complaint designated as 1 through 59 inclusive, with the same force and effect as though each were fully set forth at length herein.

61) The true purpose of the defendants in assaulting me was based on my being the victim of illegal wire taps at the *house of Israel* location, and my involvement in the purchase of the former Methodist Church building contrary to the wishes of influential person Kathleen Stanfield, and to harass me, and the *house of Israel*, as is evidenced by the slanderous widespread public statements against me and the *house of Israel* by defendants Reece Daniel and Jason Price. There being no probable cause, the defendants could find no legal basis for any criminal or penal charges against me, and so they falsely fabricated a parole absconder issue and accused David George Baugh in a fallacious, and fatally defective complaint and futile attempt to justify their heinous felony breach of fiduciary duty in order to gain access to the interior of the building, in order to

ultimately obtain access to the financial records regarding the purchase of the former Methodist Church building, and then to frame me with fraudulent criminal actions in order to prevent our church group from ever having access to the former Methodist Church building, defrauding the public they purport to serve.

62) Absent arrest warrant and without probable cause the seizures and searches were conducted against me by defendants. No rational or reasonable basis existed or exists for the aforesaid actions taken against me by defendants. There were no exigent circumstances existing to justify the failure to obtain proper arrest warrants prior to conducting the aforesaid seizures and searches against me, and no lawful basis existed for my suffering aggravated assault, aggravated kidnapping, involuntary servitude, and armed robbery executed directly or indirectly by the defendants.

63) The aforesaid seizures and searches of me and my private property were irrational, unreasonable, overly intrusive, abusive, and intended to harass and harm me, and perpetuate criminal syndicalism for unjust enrichment.

64) My afore described unlawful seizure and the unlawful search of my private property, and forcing me into involuntary servitude by force of arms for their personal entertainment as conducted by the defendant mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G Franklin, Paul Allen, and Jon Shobert constituted unreasonable and excessive force by said defendant paramilitary gangsters, as supported and paid by the City of Jacksonville and evil miscreants known as Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, and Rob Beall named as defendants herein.

65) The aforesaid collusive actions of all defendants, jointly and severally is in furtherance of a conspiracy to deprive me of my substantive and procedural rights to due process of law, and equal rights and protections of the laws, and did, in fact, absent substantive and procedural due process of law, deprive me of rights, privileges, and immunities enjoyed by American citizens all as set out herein.

66) Solely as a result of all the foregoing, I was unlawfully deprived of my sacred Liberty and freedom by forcing me into involuntary servitude by force of arms, while I was being set up to be framed with false charges, by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, and Jon Shobert, under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth

Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

67) In the manner aforesaid, each of the defendants, jointly and severally, willfully and wantonly, and outside the scope of their respective duly delegated statutory, or ordinance authority or jurisdiction, acting under color of law, and under color of office, *ultra vires*, violated their corporate charter and my rights as follows:

a) to be free from unreasonable search and seizure of my person, private papers and my private property;

b) to be free from such search and seizure without warrant;

c) to be free from such search and seizure without probable cause;

d) to be free from use of excessive force;

e) to be free from aggravated assault and aggravated kidnapping;

f) to be free from infliction of severe and extreme mental and emotional distress and physical injuries;

g) to be free from negligence, calloused indifference, and bias and prejudice in the performance of inland piracy;

h) to be free from summary punishment without a trial;

i) to be free from ungrounded, selective, vindictive, and malicious persecution;

j) to be free from armed robbery;

k) to be free from the results of inadequate or improper training lauded by superior gangsters for their subordinate gangsters violating my rights secured by the State and U.S. Constitutions;

l) to be free from aggravated kidnapping and false arrest;

m) to have substantive and procedural due process of law;

n) to be free from abuse, and disrespect;

o) to be free from being placed in unnecessary life-endangerment;

p) to be free from persecutions and harassment by defendant mercenaries for my claim and exercise of rights to the foregoing and freedom of assembly, association, speech, redress of grievances, and practice and exercise of my strongly and sincerely-held spiritual training and beliefs, guaranteed by the State and U.S. Constitutions; and

q) to be free from public vilification, degradation, and slander instigated, promoted, and perpetuated in collusion and conspiracy amongst themselves and with the local media by the narcissistic, arrogant, disrespectful, insolent, constitutionally disobedient, biased, prejudiced, and obviously woefully ignorant and incompetent public servant defendant mercenaries, and other defendants.

68) All of my aforesaid rights, "a" through "q" are secured to me by the provisions of the *First, Fourth, Fifth, Ninth, Thirteenth and Fourteenth (as it applies to the State of Texas) Amendments to the Constitution of the United states of America*, and by 42 U.S.C., §§1983, 1985, and 1986, and by the statutes and laws of the State of Texas which are invoked under the supplemental jurisdiction of this Court.

69) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries, giving rise to this Complaint.

SECOND CAUSE OF ACTION

70) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated 1 through 69, inclusive, with the same force and effect as though each were fully set forth at length herein.

71) That each of the defendants, jointly and severally, intentionally and for the purpose of causing me to suffer severe and extreme mental and emotional distress conducted, and absent retraction, are conducting themselves toward me in a manner that is outrageous and shocks the conscience in that it exceeds all rational and reasonable bounds of decency, and is flagrant undermining of the U.S. Constitution.

72) That each of the defendants recklessly conducted, and are conducting themselves toward me in a manner so outrageous and shocking that it exceeds all rational and reasonable bounds of decency, as evidenced in part by acting as TRESPASSERS AB INTIO and the utter refusal to even do an Internal Affairs Investigation

73) That solely by reason of all the foregoing acts of armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, and Jon Shobert, under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision

and oversight of Governor Rick Perry and Attorney General Greg Abbott, I have suffered, and continue to suffer from severe and extreme mental and emotional distress and severe and extreme damages and injuries.

THIRD CAUSE OF ACTION

74) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated 1 through 73, inclusive, with the same force and effect as though each were fully set forth at length herein.

75) That the event at the aforesaid time and place, initiated TORTUOUS INTERFERENCE WITH FUTURE ECONOMIC THIRD PARTY RELATIONSHIPS AND LIBERTY OF CONTRACT which has gone on for over two years as I was assaulted and deprived of my liberty, and even my choices were diverted to repair of the smashed door and then having to deal with the media attacks instigated by the defendants, plus having to deal with the blatant and obvious criminal frame job being wrongfully constructed against me by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, and Jon Shobert, under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

76) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

77) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme damages and injuries.

FOURTH CAUSE OF ACTION

78) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 77, inclusive, with the same force and effect as though each were fully set forth at length herein.

79) That absent arrest warrant on May 15, 2008, I was FALSELY ARRESTED in the nature of kidnapping, by the defendant Daniel G. Franklin, who was aided and abetted by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Paul Allen, and Jon Shobert, under the aegis of the City of Jacksonville, along

with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott

80) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct, and in fact, repeatedly tried to resolve the matter in an amicable reasonable manner, but was totally ignored and shunned by defendants.

FIFTH CAUSE OF ACTION

81) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 80, inclusive, with the same force and effect as though each were fully set forth at length herein.

82) That on May 15, 2008, absent arrest warrant I was KIDNAPPED by the defendant Daniel G. Franklin, who was aided and abetted by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Paul Allen, and Jon Shobert, under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott

83) That on May 22, 2008, I was KIDNAPPED by the armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

84) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct, and in fact, repeatedly tried to resolve the matter in an amicable reasonable manner, but was totally ignored and shunned by defendants.

SIXTH CAUSE OF ACTION

85) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 84, inclusive, with the same force and effect as though each were fully set forth at length herein.

86) That at the aforesaid time and place, contrary to 18 USC §1346 and the requirement for Honest Government Service, and as a matter of DECEPTIVE TRADE PRACTICES, wherein the City of Jacksonville operated without legally established management personnel who failed and neglected to legally create a police department, but sent armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Anthony G. Forson, Jon Shobert, David M. Gayler, and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott, whereby I was, and without retraction I am being impermissibly, selectively, vindictively, and maliciously persecuted by the defendants herein.

87) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

88) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

SEVENTH CAUSE OF ACTION

89) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 88, inclusive, with the same force and effect as though each were fully set forth at length herein.

90) Absent jurisdiction based upon a facially and substantively fatally defective application for search warrant Craig Fletcher acted in his private capacity to wrongfully breach the Fourth Amendment in Felony breach of oath by maliciously signing a fatally defective search warrant, whereas since he was unable to act as a fair, neutral, and impartial magistrate he should have immediately recused himself on May 15, as opposed to recusing himself as he did in 2009 prior to the trial arising from the event complained of herein, actually a PRE-trial evidentiary hearing converted to a trial since the gangsters

disguised as police who had falsified the documentation had NO EVIDENCE wherefore I was found NOT GUILTY. Absent any convictions, and based upon blatantly FALSIFIED DOCUMENTATION, 'Rubber Stamp' Craig Fletcher signed for all THREE attacks, May 15, May 22, and June 11, 2008, based upon falsified documentation, causing immense damages without justification, and evidencing that he was not acting as a fair, neutral, and impartial magistrate.

91) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

EIGHTH CAUSE OF ACTION

92) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 91, inclusive, with the same force and effect as though each were fully set forth at length herein.

93) In the event that it is determined that based upon a facially and substantively fatally defective application for search warrant Craig Fletcher acted in his Official capacity I require DECLARATORY AND INJUNCTIVE RELIEF based upon the fact I still assert that he wrongfully breached the Fourth Amendment in Felony breach of oath by maliciously signing a fatally defective search warrant, and whereas he was unable to act as a fair, neutral, and impartial magistrate he should have immediately recused himself on May 15, 2008 as opposed to recusing himself as he did in 2009 prior to the trial arising from the events complained of herein, actually a PRE-trial evidentiary hearing converted to a trial since the gangsters disguised as police had NO EVIDENCE wherefore I was found NOT GUILTY.

94) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

95) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

NINTH CAUSE OF ACTION

96) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 95, inclusive, with the same force and effect as though each were fully set forth at length herein.

97) DISCRIMINATION is evidenced by excessive bonds relative to other cases handled by Craig Fletcher at the Cherokee County Court and the fact that on December 3, 2008, at my alleged arraignment for the May 22 so-called arrest Craig Fletcher created a discriminatory proceeding by DENYING me my numerous public witnesses, who had traveled substantial distances, by DENYING access to a public forum contrary to Texas Code of Criminal Procedure, Article 1.24, in violation of Penal Code §39.03 Official Oppression; Craig Fletcher also denied my testimony offered on religious grounds contrary to Texas Code of Criminal Procedure, Article 1.17, and in violation of Penal Code §39.03 Official Oppression wherein criminal acts are outside official jurisdiction.

98) DISCRIMINATION is also evidenced by the public vilification and general treatment I experienced at the hands of armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott, whereby I was, and without retraction I am being impermissibly, selectively, vindictively, and maliciously persecuted by the defendants herein.

99) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

100) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TENTH CAUSE OF ACTION

101) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 100, inclusive, with the same force and effect as though each were fully set forth at length herein

102) On May 22, 2008, Reece Daniel did ASSAULT me in the booking area of the Jacksonville Jail, and if I had done to him that which he did to me there certainly would have been a criminal charge, however I was abused while Reece Daniel was not charged.

103) The assault by Reece Daniel was directly or indirectly supported by armed and dangerous mercenaries John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

104) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

105) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries

ELEVENTH CAUSE OF ACTION

106) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 105, inclusive, with the same force and effect as though each were fully set forth at length herein.

107) Absent Fourth Amendment warrant, and in breach of the Fifth Amendment due process protection against self incrimination and the taking of private property without just compensation, plus being contrary to Texas Code of Criminal Procedure Article 60.08 which provides for fingerprints for Felonies and misdemeanors as opposed to the mere speculation of potential Felonies and misdemeanors, while acting in an ongoing attempt to frame me, while a new technology has emerged to identify substances that have been touched, my private property fingerprints were taken by force as if I had been previously adjudicated as being public property and/or that I was appearing under involuntary servitude as punishment for future crime yet to be determined, raising the legal question as to what statute is relied upon for summary brutality in lieu of the normal fines and imprisonment

108) Absent Fourth Amendment warrant, and in breach of the Fifth Amendment due process protection against self incrimination and the taking of private property without just compensation, the assault to take my private property fingerprints by force was directly or indirectly supported by armed and dangerous mercenaries Reece Daniel, John Page,

Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

109) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

110) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWELFTH CAUSE OF ACTION

111) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 110, inclusive, with the same force and effect as though each were fully set forth at length herein.

112) Due to my serious interest in justice and the correct execution of the law I was subjected to RETALIATION, based upon illegal wiretaps and for the mercenaries to continue certain illegal practices for profit and gain, with said retaliation being directly or indirectly supported by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

113) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

114) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

THIRTEENTH CAUSE OF ACTION

115) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 114, inclusive, with the same force and effect as though each were fully set forth at length herein

116) I was subjected to DEFAMATION OF CHARACTER, fabricated by Reece Daniel and Jason Price and maliciously disseminated via the media with said defamation of character being directly or indirectly supported by armed and dangerous mercenaries, John Page, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

117) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

118) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

FOURTEENTH CAUSE OF ACTION

119) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 118, inclusive, with the same force and effect as though each were fully set forth at length herein.

120) I was subjected to RACKETEER INFLUENCED CORRUPT ORGANIZATION ACTIVITY, by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

121) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

122) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

FIFTEENTH CAUSE OF ACTION

123) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 122, inclusive, with the same force and effect as though each were fully set forth at length herein.

124) Due to all of the above I was subjected to the INTENTIONAL INFLICTION OF EXTREME EMOTIONAL DISTRESS, bringing me to the brink of suicide, and leaving me severely traumatized, as in post traumatic stress syndrome, all being directly or indirectly supported by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Jon Shobert, and Tonya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

125) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

126) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

SIXTEENTH CAUSE OF ACTION

127) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 126, inclusive, with the same force and effect as though each were fully set forth at length herein.

128) I asseverate that on June 11, 2008, contrary to the Fifth Amendment armed and dangerous mercenary Defendants acting in the nature of Inland Piracy took intellectual property without just compensation, and despite Notice and Opportunity my Tort Claim of

180 million dollars U.S. is an UNCONTESTED PUBLIC RECORD CLAIM supported by Federal Rules of Evidence, Rules 201 and 902 against the City of Jacksonville.

129) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

130) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

SEVENTEENTH CAUSE OF ACTION

131) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 130, inclusive, with the same force and effect as though each were fully set forth at length herein.

132) I asseverate that on December 3, 2009, contrary to the Fourth and Fifth Amendments armed and dangerous mercenary Defendants acting in the nature of Inland Piracy seized me whereby I was inducted into Involuntary Servitude without just compensation, and despite Notice and Opportunity my Tort Claim of 30 million dollars U.S. is an UNCONTESTED PUBLIC RECORD CLAIM supported by Federal Rules of Evidence, Rules 201 and 902 against the City of Jacksonville.

133) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

134) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

EIGHTEENTH CAUSE OF ACTION

135) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 134, inclusive, with the same force and effect as though each were fully set forth at length herein.

136) I asseverate that on May 15, May 22, June 11, 2008, December 3, 2009, and January 23, 2010, contrary to the Fourth and Fifth Amendments armed and dangerous mercenary Defendants acting in the nature of Inland Piracy seized me whereby I was inducted into Involuntary Servitude without just compensation, and Defendants did so despite Notice and Opportunity as per my Waiver of Tort, thereby creating a contract as to my rights for just compensation in the amount of one million (1,000,000.00) dollars gold

(31 USC § 5112) per right, per day, with no bulk discounts for wholesale violations of my rights. as a matter of UNCONTESTED PUBLIC RECORD supported by Federal Rules of Evidence, Rules 201 and 902 against the City of Jacksonville and the STATE OF TEXAS.

137) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

138) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

NINETEENTH CAUSE OF ACTION

139) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 138, inclusive, with the same force and effect as though each were fully set forth at length herein.

140) I asseverate that Craig Caldwell is educated, trained, paid, and sworn to uphold the law, wherefore, absent evidence, his prosecution of the bogus drug cases, as in a criminal conspiracy with other Defendants, constituted **MALICIOUS PROSECUTION AND PERFIDIOUS PERJURY OF OATH**, as further substantiated by aiding and abetting the criminal acts of Daniel Franklin and Craig Fletcher.

141) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

142) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTIETH CAUSE OF ACTION

143) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 142, inclusive, with the same force and effect as though each were fully set forth at length herein.

144) I asseverate that defendant prosecutors Elmer C. Beckworth Jr., Gordon LeMaire, and Rachel Patton were and are educated, trained, paid, and sworn to uphold the law, wherefore they knew or should have known that acting in a criminal conspiracy with other Defendants, constituted **MALICIOUS PROSECUTION AND PERFIDIOUS FELONY**

PERJURY OF OATH, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants.

145) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

146) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-FIRST CAUSE OF ACTION

147) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 146, inclusive, with the same force and effect as though each were fully set forth at length herein

148) I asseverate that defendant prosecutors Elmer C. Beckworth Jr., Gordon LeMaire, and Rachel Patton were and are educated, trained, paid, and sworn to uphold the law, wherefore they knew or should have known that any immunity covering prosecutorial functions does not extend to investigation of my financial affairs, as evidenced by fraudulently utilizing the ruse of the bogus "Barratry" matter in order to take the bank to the Grand Jury while acting in a criminal conspiracy with other Defendants to violate the intent and spirit of the Fourth Amendment under color of law, constituting a **PERFIDIOUS PERJURY OF OATH**, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants.

149) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

150) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-SECOND CAUSE OF ACTION

151) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 150, inclusive, with the same force and effect as though each were fully set forth at length herein.

152) I asseverate that defendant prosecutors Elmer C. Beckworth Jr., Gordon LeMaire, and Rachel Patton were and are educated, trained, paid, and sworn to uphold the law, and

purport to represent the STATE OF TEXAS, wherefore they knew or should have known that acting in collusion in a criminal conspiracy with Dwight Phifer and Sheriff James Campbell plus other Defendants to keep me incarcerated contrary to LAW established as per the Texas Code of Criminal Procedure, Article 17.151, in violation of **Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath**, all against the peace and dignity of the State Of Texas, while purporting to represent the STATE OF TEXAS in executing criminal acts, as further substantiated by the aiding and abetting of the overwhelming load of criminal acts of the Jacksonville Defendants.

153) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

154) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-THIRD CAUSE OF ACTION

155) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 154, inclusive, with the same force and effect as though each were fully set forth at length herein

156) I asseverate that defendants B. K. Menefee and J. Dan Connelly were falsely posing as municipal judges acting for the City of Jacksonville while being educated, trained, paid, and sworn to uphold the law, wherefore they knew or should have known that acting in collusion in a criminal conspiracy with armed and dangerous mercenaries John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, Anthony G. Forson, Jon Shobert, David M. Gayler and Tonnya E. Sonntag under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott. plus other Defendants, in order to summarily deprive me of rights contrary to LAW established as per the Texas Code of Criminal Procedure, Chapters 15, 16, and 17, in violation of **Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath**, all against the peace and dignity of the State

of Texas, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants.

157) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

158) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries

TWENTY-FOURTH CAUSE OF ACTION

159) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 158, inclusive, with the same force and effect as though each were fully set forth at length herein.

160) I asseverate that defendant judge Dwight Phifer and Sheriff James Campbell were and are educated, trained, paid, and sworn to uphold the law, wherefore they knew or should have known that acting in collusion in a criminal conspiracy with prosecutors Elmer C. Beckworth Jr., Gordon LeMaire, and Rachel Patton plus other Defendants to keep me incarcerated contrary to LAW established as per the Texas Code of Criminal Procedure, Article 17.151, in violation of **Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath**, all against the peace and dignity of the State of Texas, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants.

161) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

162) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-FIFTH CAUSE OF ACTION

163) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 162, inclusive, with the same force and effect as though each were fully set forth at length herein.

164) I asseverate that defendant judge Bascom W. Bentley III is educated, trained, paid, and sworn to uphold the law, wherefore he knew or should have known that any immunity

covering judicial functions does not extend to assuming facts not in evidence in order to create a personal blast of DEFAMATION OF CHARACTER against our church group and on the record in the January 7, 2009, hearing while acting in a criminal conspiracy with other Defendants to violate the intent and spirit of both State and Federal constitutions under color of law, in violation of **Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath**, all against the peace and dignity of the State of Texas, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants.

165) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

166) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-SIXTH CAUSE OF ACTION

167) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 166, inclusive, with the same force and effect as though each were fully set forth at length herein.

168) I asseverate that defendant judge Bascom W. Bentley III is educated, trained, paid, and sworn to uphold the law, wherefore he knew or should have known that any immunity covering judicial functions does not extend to participation in a criminal conspiracy with other Defendants to violate the law under color of law, as in visiting at the jail to terrorize me as to Felony Barratry while he knows or should know the law and be fully aware that in speaking to me he was addressing the victim of a KIDNAPPING as it is impossible for me to do Barratry, yet he failed to ORDER my discharge, in violation of **Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath 18 USC §1621**, all against the peace and dignity of the State of Texas, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants, as per his personal bias and prejudice against me, DISCRIMINATION.

169) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

170) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-SEVENTH CAUSE OF ACTION

171) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 170, inclusive, with the same force and effect as though each were fully set forth at length herein.

172) I asseverate that defendant attorneys Joe Angle and D. Brett Brewer are educated, trained, paid, and sworn to uphold the law, wherefore they knew or should have known that any immunity covering their functions does not extend to participation in a criminal conspiracy with other Defendants to violate the law under color of law, as in allowing proceedings to be conducted in the municipal court while they know or should know the law and be fully aware that the City lacks qualified personnel, yet they failed to ORDER my discharge, in violation of **Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath 18 USC §1621**, all against the peace and dignity of the State of Texas, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants, for the purpose of depriving me of my rights while I was being repeatedly inducted into Involuntary Servitude by force of arms under color of law and persecuted for over two years.

105) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

173) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-EIGHTH CAUSE OF ACTION

174) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 173, inclusive, with the same force and effect as though each were fully set forth at length herein.

175) I asseverate that defendant judge Bascom W. Bentley III is educated, trained, paid, and sworn to uphold the law, wherefore he knew or should have known that any immunity covering judicial functions does not extend to participation in a criminal conspiracy with

other Defendants to violate the law under color of law, as in visiting at the jail to terrorize me as to Felony Barratry while he knows or should know the law and be fully aware that in speaking to me he was addressing the victim of a KIDNAPPING as it is impossible for me to do Barratry, yet he failed to ORDER my discharge, in violation of Texas Penal Code Section 39.03, Official Oppression and in Felony Perjury of Oath 18 USC §1621, all against the peace and dignity of the State of Texas, as further substantiated by the aiding and abetting of the criminal acts of the Jacksonville Defendants, as per his personal bias and prejudice against me, DISCRIMINATION.

176) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

177) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

TWENTY-NINTH CAUSE OF ACTION

178) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 177, inclusive, with the same force and effect as though each were fully set forth at length herein.

179) I asseverate that TEXAS MUNICIPAL LEAGUE RISK POOL promotes criminal activity by indemnifying criminal acts for profit and gain, as in a criminal conspiracy with other Defendants acting in a racketeer influenced corrupt organization (RICO), as evidenced in part by paying to suborn perjury, and even giving an award on or about November 5, 2008, to the non-existent Jacksonville Police Department for hiring NON-CERTIFIED OFFICERS, while I have given notice of the life threatening persecution I have been suffering for over two years.

180) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

181) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

THIRTIETH CAUSE OF ACTION

182) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 182, inclusive, with the same force and effect as though each were fully set forth at length herein.

183) I asseverate that THE CITY OF JACKSONVILLE promotes criminal activity by indemnifying criminal acts for profit and gain, as in a criminal conspiracy with other Defendants acting in a racketeer influenced corrupt organization (RICO), as evidenced in part by paying to suborn perjury, and continually supporting and actually paying the non-existent Jacksonville Police Department gangsters and even NON-CERTIFIED OFFICERS to violate the rights of others, while I have given abundant notice of the life threatening persecution I have been suffering for over two years as a result of THE CITY OF JACKSONVILLE paying to support criminal activity, even when it is contrary to Texas Government Code

184) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct

185) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

THIRTY-FIRST CAUSE OF ACTION

186) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 185, inclusive, with the same force and effect as though each were fully set forth at length herein.

187) I asseverate that Charlotte Huffman, David Tillery, KETK-56 TV, and Joe Terrell and KLTN-7 ABC TV have, contrary to their respective FCC licenses and in conjunction with the Jacksonville Daily Progress, without retraction, discriminated against me for profit and gain, as in acting as a part of a criminal conspiracy with other Defendants acting in a racketeer influenced corrupt organization (RICO), as evidenced in part by negligently supporting gangsters pretending to be officers of the non-existent Jacksonville Police Department which acts to violate the rights of others, while I have given abundant notice of the life threatening religious and political persecution I have been suffering for over two years as a result of THE CITY OF JACKSONVILLE paying to support criminal activity, even though it is contrary to Texas Government Code.

188) That I did not in any way whatsoever instigate, cause, or contribute to the complained of conduct.

189) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

THIRTY-SECOND CAUSE OF ACTION

190) I repeat and reiterate each and every allegation contained in the paragraphs of this Complaint designated as 1 through 189, inclusive, with the same force and effect as though each were fully set forth at length herein.

191) I asseverate violations of the Constitution for the United States of America, Article VI, Treaties of Peace, as well as State pendent causes as follow:

ABUSE OF PROCESS

ASSAULT

CONSPIRACY

BREACH OF CONTRACT

TORTUOUS INTERFERENCE WITH EXISTING CONTRACT

CONVERSION

BREACH OF FIDUCIARY DUTY

DECEPTIVE TRADE PRACTICES ACT

FRAUD, COMMON LAW AND STATUTORY

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

INVASION OF PRIVACY

PUBLIC DISCLOSURE OF PRIVATE FACTS

LIBEL AND SLANDER

BUSINESS DISPARAGEMENT

SLANDER OF TITLE

MALICIOUS PROSECUTION

NEGLIGENCE

NEGLIGENT HIRING / SUPERVISION / TRAINING / RETENTION

NUISANCE, BOTH PRIVATE AND PUBLIC

TRESPASS TO REAL PROPERTY

COMMON LAW BREACH OF WARRANTY (HONEST AND LAWFUL GOVERNMENT SERVICES)

RELIGIOUS DISCRIMINATION

As executed by armed and dangerous mercenaries Reece Daniel, John Page, Jason Price, Travis Cearley, Daniel G. Franklin, Paul Allen, and Jon Shobert, under the aegis of the City of Jacksonville, along with the influence of Kathleen Stanfield, and facilitated by Craig Fletcher, and with Mo Raissi, Robert Haberle, Kenneth Melvin, Hubert Robinson, Jeff Smith, Rob Beall, and Betty Thompson acting in collusion and/or conspiracy, aided

and abetted by the negligent lack of proper supervision and oversight of Governor Rick Perry and Attorney General Greg Abbott.

192) That solely by reason of all the foregoing, I have suffered, and continue to suffer severe and extreme mental and emotional distress and severe and extreme damages and injuries.

CONDITIONS PRECEDENT F.R.C.P. 9(c)
DEMANDS FOR ALTERNATIVE RELIEF F.R.C.P. 8
AND JURY DEMAND F.R.C.P. 38

193) All conditions precedent have occurred or been performed. This statement is made pursuant to F.R.C.P. 9(c). Relief is demanded, in the alternative, pursuant to F.R.C.P. 8.

194) I respectfully demand my right to trial by jury on all issues. This statement is made in furtherance of my rights under the *Seventh* and *Fourteenth Amendments as it applies to the State of Texas*, and pursuant to F.R.C.P. 38.

RELIEF SOUGHT

195) WHEREFORE, I, Robert James Fox, upon my OFFER OF PROOF, and the evidence provided thereby, herein demand judgment against the defendants, and each of them, jointly and severally, on each cause of action herein and as follows:

a) Declaratory judgments and injunctive relief, as per Federal Rules of Evidence, Rules 201 and 902 being in full force and effect, regarding PUBLIC RECORD AFFIDAVITS UNCONTESTED for over thirty days upon the public record prior to the filing of this lawsuit and/or relative to matters raised in these causes of action;

b) Declaratory judgments and injunctive relief as per each and every party not eligible to receive financial compensation as per Texas Government Code, duly noting the criminal embezzlement for criminal prosecution purposes;

c) Declaratory judgments as per the evidence in each event relating to BREACH OF THE FOURTH AMENDMENT BY FORCE OF ARMS UNDER COLOR OF LAW, AND/OR FIFTH AMENDMENT TAKINGS WITHOUT JUST COMPENSATION, AND/OR BREACH OF THE THIRTEENTH AMENDMENT AS TO INVOLUNTARY SERVITUDE IMPOSED BY FORCE OF ARMS UNDER COLOR OF LAW, AND/OR INLAND PIRACY BY FORCE OF ARMS, AND/OR 18 USC §§241/242, AND/OR 18 USC §247 Destruction of Religious Property, AND/OR 18 USC §1581 Peonage, AND/OR 18 USC §1621 Perjury of Oath, AND/OR P.A.T.R.I.O.T. ACT, AND/OR TORTURE, AND/OR Genocide;

d) Criminal prosecutions commenced as supported by Federal Public Law 97-280, 96 Stat. 1211, and Deuteronomy 19:15-21, in every instance where there is probable cause to believe a crime has been committed by any of the Defendants;

e) Triple damages upon a finding of R.I.C.O. and/or Deceptive Trade Practices, as per Compensatory damages in the minimum amount of Three-Hundred-Thousand-Dollars (\$300,000 00), or in an amount determined by the trier of the facts and which this Court shall consider to be just and fair;

f) Upon a finding of FIFTH AMENDMENT TAKING WITHOUT JUST COMPENSATION as to intellectual property 180 million dollars U.S. as per UNCONTESTED PUBLIC RECORD CLAIM upon the City of Jacksonville, an ORDER for payment of the 180 million dollars U.S.;

g) Upon a finding of FIFTH AMENDMENT TAKING WITHOUT JUST COMPENSATION as to time and resources relating to the wrongful arrest and bogus persecution under color of law as to "Barratry", 30 million dollars U.S. as per UNCONTESTED PUBLIC RECORD CLAIM upon the City of Jacksonville, an ORDER for payment of the 30 million dollars U.S.;

h) Upon a finding of violations of my rights and/or Fourth Amendment violation, and/or FIFTH AMENDMENT TAKING WITHOUT JUST COMPENSATION as to time and resources relating to the wrongful arrest and bogus persecution under color of law as provided for in my Waiver of Tort, thereby creating a contract as to my rights for just compensation in the amount of one million (1,000,000 00) dollars gold (31 USC § 5112) per right, per day, with no bulk discounts for wholesale violations of my rights, as a matter of UNCONTESTED PUBLIC RECORD CLAIM upon the City of Jacksonville and the STATE OF TEXAS, an ORDER upholding the unalienable right to contract with enforcement of the contract established pursuant to my Waiver of Tort for payment of one million (1,000,000 00) dollars gold (31 USC § 5112) per right, per day, with no bulk discounts for wholesale violations of my rights;

i) Punitive and exemplary damages against each defendant in an amount determined by the trier of the facts and which this Court shall consider to be just and fair;

j) Compensation for my personal time and costs of this litigation, and assistance of counsel in its preparation and implementation in an amount to be determined by the trier of

the facts and which this Court shall consider to be just and fair as Biblically a workman is worthy of his hire; and

k) Together with any other costs and disbursements of this action, and such other relief to which I am entitled as a matter of law, and this Court has power to grant *sua sponte*.

l) An ORDER for the triple reimbursement of the Bonds extorted from me by force of arms, under color of law, upon the fraudulently imposed charges

m) B K Menefee, J. Dan Connelly, Craig Fletcher, Dwight Phifer, and Bascom W. Bentley III, are sued only for declaratory and injunctive relief, except as to acts performed absent jurisdiction, as to which monetary damages are to be assessed by the trier of facts.

n) An order must be made to have sufficient audio and visual recording in Texas jail facilities made available to the public in real time, and in particular City of Jacksonville, that assault and violence cannot be conducted without being recorded, and in this case that the City of Jacksonville cease and desist utilizing abuse facility, such as the so-called jail, until there is a lawfully created police department staffed by competent peace officers instead of rogue paramilitary mercenaries.

o) A hearing must be set for thirty days after judgment in order for the defendants to evidence their compliance with the judgment of the court and jury, whereby failing to evidence their compliance with the judgment of the court and jury the defendants may be incarcerated for civil contempt until such time as they do comply with the judgment of the court and jury.

196) I am not an expert in the law however I do know right from wrong. If there is any human being damaged by any statements herein, if he will inform me by facts I will sincerely make every effort to amend my ways. I hereby and herein reserve the right to amend and make amendment to this document as necessary in order that the truth may be ascertained and proceedings justly determined. If the parties given notice by means of this document have information that would controvert and overcome this Affidavit, please advise me IN WRITTEN AFFIDAVIT FORM within thirty (30) days from receipt hereof providing me with your counteraffidavit, proving with particularity by stating all requisite actual evidentiary fact and all requisite actual law, and not merely the ultimate facts or conclusions of law, that this Affidavit Statement is substantially and materially false

sufficiently to change materially my status and factual declarations. Your silence stands as consent to, and tacit approval of, the factual declarations herein being established as fact as a matter of law. May the will of our Heavenly Father Yahvah, through the power and authority of the blood of His Son Yahshua be done on Earth as it is in Heaven.

**Reserving ALL Natural God-Given Unalienable
Birthrights, Waiving None, Ever,**

28 USC §1746

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed on this the third day of the ninth month in the year of our Lord and Savior two thousand ten.



**Robert James Fox, unrepresented
as in U.S. v. Fox, 766 F.Supp. 569,
a winning case that was cited at 18 USCA §1546(a),
a missionary in a Matthew 25 mission
c/o 1304 CR 1890, Bivins, Texas 903-799-5500**